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Attorneys for Defendants
IRICO GROUP CORP. AND
IRICO DISPLAY DEVICES CO., LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No.: 07-cv-05944 JST

MDL No. 1917

This document relates to:

ALL ACTIONS

**DECLARATION OF GERALDINE W.
YOUNG IN SUPPORT OF IRICO
DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL PURSUANT TO
CIVIL LOCAL RULES 7-11 AND 79-5**

1 I, Geraldine W. Young, declare as follows:

2 1. I am a member of the bar of the State of Texas and admitted *pro hac* vice in this
3 matter. I am an attorney with Norton Rose Fulbright US LLP, which represents Defendants Irico
4 Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Administrative Motion to Seal Record Pursuant to Civil Local Rules 7-11 and
7 79-5(f) (the “Motion”).

8 2. Except for those matters stated on information and belief, about which I am
9 informed and which I believe to be true, I have personal knowledge of the facts set forth herein
10 and, if called upon, could and would competently testify thereto under oath.

11 3. On June 18, 2008, the Court issued a Stipulated Protective Order (ECF No. 306)
12 (“Protective Order”) in this matter.

13 4. Pursuant to Civil Local Rules 7-11 and 79-5(d) and the Protective Order, I make this
14 declaration on behalf of the Irico Defendants to provide the basis for the Court to maintain under
15 seal certain excerpts of documents and information containing either: 1) Confidential
16 communications between Irico and its former outside counsel that were attorney-client privileged
17 and attorney work product and produced subject to court order as part of the sanctions proceedings
18 and subject to Irico’s confidentiality designations, pursuant to the Stipulated Protective Order, ECF
19 No. 0306, or 2) confidential personal employee information.

20 5. Attached hereto are true and correct copies of Document 3 (Exhibits A-Z of the
21 Declaration of Lauren C. Capurro In Support of Plaintiffs’ Motion for Sanctions Against the Irico
22 Defendants) and Document 4 (Exhibits AA-ZZ of the Declaration of Lauren C. Capurro In Support
23 of Plaintiffs’ Motion for Sanctions Against the Irico Defendants).

24 6. Document 4 contains a true and correct copy of IRI-SU-000052-54, which contains
25 Confidential personal employee information on page 3 of Exhibit VV to Document 4, IRI-SU-
26 000054 (PDF page number 985).

27 7. Attached hereto are true and correct copies of Document 8 (Exhibits A-Y to the
28 Declaration of Thomas Carter In Support of Irico Defendants’ Opposition to Plaintiffs Motion for

1 Sanctions Against the Irico Defendants) and Document 11 (Declaration of R. Alexander Saveri In
 2 Support of Plaintiffs' Reply Brief in Support of Motion for Terminating Sanctions against the Irico
 3 Defendants).

4 8. Document 8 contains a true and correct copy of IRI-SU-000103E-128E, which is a
 5 certified English translation of IRI-SU-000103-138, which contains Confidential personal
 6 employee information on pages 5, 7-8, 13-22, 26-29, 31 of Exhibit K to Document 8, IRI-SU-
 7 000106E, IRI-SU-000108E-109E, IRI-SU-000114E-120E, IRI-SU-000123E-127E and pages 37,
 8 39-40, 45-01, 54-58 of Exhibit K to Document 8, IRI-SU-000106, IRI-SU-000108-109, IRI-SU-
 9 000114-19, IRI-SU-000123-27 (PDF page numbers 162, 164-65, 170-79, 183-86, and 188, 194,
 10 196-97, 202-07 and 211-15).

11 9. Document 8 contains a true and correct copy of IRI-SU000052E-54E, which is a
 12 certified English translation of IRI-SU000052-54, which contains Confidential personal employee
 13 information on page 4 of Exhibit L to Document 8, IRI-SU-000054E, and Page 7 of Exhibit L to
 14 Document 8, IRI-SU-000054 (PDF page numbers 221 and 224).

15 10. Document 8 contains a true and correct copy of IRI-SU-000133E-134E, which is a
 16 certified English translation of IRI-SU-000133-134, which contains Confidential personal
 17 employee information on pages 2-3 of Exhibit U to Document 8, IRI-SU-000133E-134E, and
 18 pages 4-5 of Exhibit U to Document 8, IRI-SU-000133-134, (PDF page numbers 356-359).

19 11. Document 8 contains a true and correct copy of IRI-CRT-00031561_FTE-
 20 TRANSLATION--00031562_FTE_TRANSLATION, which is a certified English translation of
 21 IRI-CRT-00031561-00031562 , which contains Confidential personal employee information on
 22 page 2 of Exhibit Y to Document 8, IRI-CRT-00031561_FTE-TRANSLATION, and page 4 of
 23 Exhibit Y to Document 8 , IRI-CRT-00031561-00031562 (PDF page numbers 382 and 384).

24 12. Attached hereto are true and correct copy of Document 23 (Declaration of John M.
 25 Taladay Regarding Compliance With Interim Orders on Plaintiffs' Motion for Discovery
 26 Sanctions), Document 24 (Plaintiffs' Letter Brief In Further Support of Motion for Terminating
 27 Sanctions or Alternative Sanctions Against the Irico Defendants), Document 25 (Declaration of
 28 David Y. Hwu In Support of Plaintiffs' Letter Brief In Further Support of Motion for Terminating

1 Sanctions or Alternative Sanctions Against the Irico Defendants), Document 26 (Irico Defendants'
2 Letter to Special Master Walker Regarding Clarifications of Facts Related to Mr. Su Xiaohua's
3 departure from Irico), Document 27 (Irico Defendants' Response to Plaintiffs' Letter Brief In
4 Further Support of Motion for Terminating Sanctions or Alternative Sanctions Against the Irico
5 Defendants, and Document 33 (Plaintiffs' Letter to Special Master Walker Regarding the Irico
6 Defendants' Production of Documents).

7 13. Document 23 contains a true and correct copy of IRI-SU-000219E, which is a
8 certified English translation of IRI-SU-000219, which contains Confidential personal employee
9 information on page 2 of Exhibit 2 to Document 23, IRI-SU-000219, and page 3 of Exhibit 2 to
10 Document 23, IRI_SU-000219E (PDF page numbers 17-18).

11 14. Document 23 contains a true and correct copy of IRI-SU-000202E, which is a
12 certified English translation of IRI-SU-000202, which contains Confidential personal employee
13 information on pages 2-3 of Exhibit 3 to Document 23, IRI-SU-000202E (PDF page numbers 21-
14 22).

15 15. Document 25 contains a true and correct copy of IRI-SU-000219E, which is a
16 certified English translation of IRI-SU-000219, which contains Confidential personal employee
17 information on page 2 of Exhibit 2 to Exhibit A of Document 25, IRI-SU-000219E, and page 3 of
18 Exhibit 2 to Exhibit A of Document 25, IRI-SU-000219)(PDF page numbers 111-12).

19 16. Document 25 contains a true and correct copy of IRI-SU-000202E, which is a
20 certified English translation of IRI-SU-000202, which contains Confidential personal employee
21 information on pages 2-3 of Exhibit 3 to Exhibit A of Document 25 , IRI-SU-000202E (PDF page
22 numbers 115-16).

23 17. Document 25 contains a true and correct copy of IRI-SU-
24 000402E_TRANSLATION-000403E_TRANSLATION, which is a certified English translation of
25 IRI-SU-000402-000403, which contains Confidential personal employee information on page 3 of
26 Exhibit B of Document 25, IRI-SU-000403E_TRANSLATION, and page 5 of Exhibit B of
27 Document 25, IRI-SU-000403 (PDF page numbers 174 and 176).
28

1 18. Document 25 contains a true and correct copy of IRI-SU-
2 000141E_TRANSLATION, which is a certified English translation of IRI-SU-000141, which
3 contains Confidential personal employee information on page 2 of Exhibit D of Document 25, IRI-
4 SU-000141E_TRANSLATION, and page 3 of Exhibit D of Document 25, IRI-SU-000141 (PDF
5 page numbers 183-184).

6 19. Document 25 contains a true and correct copy of IRI-SU-
7 001467E_TRANSLATION, which is a certified English translation of IRI-SU-
8 001467E_TRANSLATION, which contains Confidential personal employee information on page
9 2 of Exhibit K of Document 25, IRI-SU-001467E, and page 3 of Exhibit K of Document 25, IRI-
10 SU-001467 (PDF page numbers 227-228).

11 20. Document 26 contains a true and correct copy of IRI-SU-
12 000403E_TRANSLATION, which is a certified English translation of IRI-SU-000403, which
13 contains Confidential personal employee information on page 3 of Attachment F of Document 26,
14 IRI-SU-000403E, and page 5 of Attachment F of Document 26, IRI-SU-000403 (PDF page
15 numbers 342 and 344).

16 21. Document 26 contains a true and correct copy of IRI-SU-
17 000141E_TRANSLATION, which is a certified English translation of IRI-SU-000141, which
18 contains Confidential personal employee information on page 2 of Attachment G of Document 26,
19 IRI-SU-000141E_TRANSLATION, and page 3 of Attachment G of Document 25, IRI-SU-000403
20 (PDF page numbers 347-348).

21 22. Document 26 contains a true and correct copy of IRI-SU-001006_E-001007_E,
22 which is a certified English translation of IRI-SU-001006-001007, which contains Confidential
23 personal employee information on page 3 of Attachment H of Document 26, IRI-SU-001007_E,
24 and page 5 of Attachment H of Document 26, IRI-SU-001007 (PDF page numbers 352 and 354).

25 23. Document 26 contains a true and correct copy of IRI-SU-000209_E-210_E, which
26 is a certified English translation of IRI-SU-000208-210, which contains Confidential personal
27 employee information on page 3 of Attachment J of Document 26, IRI-SU-000209_E, and page 6
28 of Attachment J of Document 26, IRI-SU-000209 (PDF page numbers 363 and 366).

/s/ Geraldine W. Young
Geraldine W. Young

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Declaration of Geraldine W. Young** was filed via CM/ECF on July 8, 2024, and as a result has been served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Matthew Park
Matthew Park